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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON AT RICHLAND

JOHN DOE 1; JOHN DOE 2; JANE
DOE 1; JANE DOE 2; JANE DOE 3;
and all persons similarly situated,

Plaintiffs,

v.

WASHINGTON STATE
DEPARTMENT OF CORRECTIONS,
STEPHEN SINCLAIR, Secretary of the
Department of Corrections, in his official
capacity,

Defendants,

and

BONNEVILLE INTERNATIONAL,
INC., a Utah Corporation, d.b.a KIRO
Radio 97.3 FM; THE MCCLATCHY
COMPANY, LLC, a California Limited
Liability Company, d.b.a. The Tacoma
News Tribune; and ANDREA KELLY,
an individual;

Interested Parties.

No.

UNOPPOSED MOTION TO
EXCEED PAGE LIMIT FOR
MOTION FOR PRELIMINARY
INJUNCTION

May 7, 2021
Without Oral Argument

1 Come now, Plaintiffs, by and through their counsel of record, and
2 respectfully move this Court for leave to exceed the page limit of ten (10) pages
3 under Local Rule 7(f)(3) in their contemporaneously filed Motion for Preliminary
4 Injunction and Motion for Provisional Class Certification.

5 Under Local Rule 7(f)(5), a “motion to exceed page limits must demonstrate
6 good cause and recite the opposing party’s position.” Here, good cause is shown
7 by the complexity and gravity of the issues at stake. As set forth in Plaintiffs’
8 Motion for Preliminary Injunction, Plaintiffs seek a class-wide injunction
9 preventing disclosure of highly sensitive and personal information, information
10 which if disclosed would most certainly put Plaintiffs and the class they represent
11 at grave risk of serious bodily harm or death. Therefore, Plaintiffs respectfully seek
12 up to an additional twenty-five (25) pages over the ten pages allowed, for a total of
13 thirty-five (35) pages.

14 For many of the same reasons, good cause is shown for permitting Plaintiffs
15 to exceed the page limits on their Motion for Provisional Class Certification and
16 Motion to Proceed in Pseudonym. There, Plaintiffs seek an additional two (2)
17 pages, for a total of twelve (12) pages, for each of these motions.

18 Plaintiffs’ counsel has contacted defense counsel, who has stated that they
19 do not oppose this motion for exceed page limits for these motions.
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2 Dated this 7th day of April, 2021.

MacDonald Hoague & Bayless

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4 By: s/ Joe Shaeffer

5 Joe Shaeffer, WSBA #33273

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7 On behalf of The American Civil Liberties
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